

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

SHI RONG ZHANG, QIU MEI ZENG,
VINCENT FENG,

Defendants.

Case No. 1:22-cr-10185-IT

**JOINT MOTION TO CONTINUE TRIAL AND
VACATE PENDING PRETRIAL DEADLINES**

Defendants Shi Rong Zhang, Qiu Mei Zeng, and Vincent Feng (each a “Defendant” and together, the “Defendants”), and the United States of America, by and through its counsel of record, jointly and respectfully request that the Court continue the trial currently scheduled for June 9, 2025 to a date after November 2025 that is mutually convenient for the Court and the parties. Defendants Chengzou Liu, Xian Rong Zeng, Wei Qing Zeng, and Da Zeng previously pled guilty on December 20, 2023, February 13, 2025, March 7, 2025, and March 26, 2025, respectively. Defendant Qui Fang Zeng has a Rule 11 Hearing set for May 14, 2025.

The government is still working to obtain certified translations of voluminous wiretap evidence in a Chinese dialect for which there are a limited number of available translators, and that process is ongoing. Moreover, on April 4, 2025, the government produced to the Defendants, for the first time, more than 4,000 additional audio recordings in various Chinese dialects. Defendants require additional time to review both the thousands of audio recordings and the translations, once they are provided by the government. For these reasons, the parties jointly request that the trial be continued to a date after November 2025 that is mutually convenient for the Court and the parties, and that the Court vacate all pending pretrial deadlines in the operative Pretrial Order (ECF No. 196).

Defendants Zhang, Qui Mei Zeng, and Feng, through their counsel, assent to an exclusion of time under the Speedy Trial Act between June 9, 2025 and November 2025, in the interests of justice.

Dated: April 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on April 9, 2025.

/s/ *Emma Notis-McConarty*
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